



CITY OF TRACY

Public Works Department

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October 15, 2002

Mr. Paul Marshall
California Department of Water Resources
Bay-Delta Office
1416 Ninth Street, P.O.Box 942836
Sacramento, CA 94236-0001

Subject: South Delta Improvements Program – Notice of Preparation of EIR/EIS

Dear Mr. Marshall:

Thank you for the opportunity to provide input into the environmental documents for the South Delta Improvements Program.

The City is concerned about the potential impacts of the proposed project in modifying flow regimes in the South Delta. When the barriers are not in place there are larger flows available for mixing and dispersion in the South Delta. But when the proposed barriers are in place, flow conditions are restricted and residence times increase.

In particular, the City is concerned that the proposed project will complicate its efforts to obtain an NPDES discharge permit for an increase in treated effluent discharge to Old River. Water quality modeling performed by the City indicates that the placement and operation of the proposed barriers creates less favorable water quality conditions than would otherwise exist. The City requests that the EIR/EIS address changes in a variety of water quality parameters – pH, dissolved oxygen, temperature, TDS or EC, TOC, 303(d) listed pollutants – that will result after implementation of the proposed project under various Delta operational scenarios. This analysis should be based on incremental changes in these parameters from an appropriate baseline condition (i.e with no barriers in place).

South Delta Improvements Program – NOP

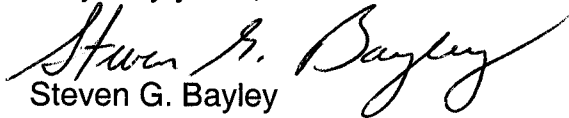
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The City has observed that, when the barriers are in place, large quantities of algae and aquatic plants grow in the stagnant south Delta. The impacts of the flow stagnation should be studied related to water quality impacts (e.g. TOC) in the Delta Mendota Canal (Tracy's municipal drinking water supply) when the barriers are removed. The impacts caused by stagnation on the dissolved oxygen content and temperature of the Old River and the Grant Line Canal should be assessed, as noted above.

Thank you for the opportunity to provide our concerns associated with the program.

Very truly yours,

A handwritten signature in black ink, appearing to read "Steven G. Bayley". The signature is fluid and cursive, with the first name "Steven" and last name "Bayley" clearly legible.

Steven G. Bayley

Deputy Director of Public Works